REMARKS

Claims 1 and 3-18 are now pending in this application. By this response to the non-final Office Action dated July 2, 2007, claims 1, 10, 15, and 18 are amended. Care has been taken to avoid the introduction of new matter. Claims 7 and 14 are indicated as allowable if rewritten in independent form. Favorable reconsideration of the application in light of the following comments is respectfully solicited.

Claims 1 and 3-9

Claims 1 and 3-9 are rejected under 35 U.S.C. § 102(b) is being anticipated by EPO Pat. App. No. 1104976 A1 (Fukumoto). Applicant respectfully traverses.

Claim 1 recites "an active function *other than storage*." Although the rejection of claim 1 is not explicit as to what portion of Fukumoto is being read upon the recited "active function," it appears to be the storage function discussed in sections 6 and 7 of the Office Action ("Fig. 1 has storage as well as wireless functions," and "Fig. 2, elements 10a and 10b perform storage and wireless functions."). However, a storage function does not teach "an active function *other than storage*," as recited in claim 1.

Further, claim 1 recites "file system calls and responses" and "translating file system calls . . . into commands recognizable by the active function." Page 3 of the Office Action asserts that "an expanded AT command such as 'AT@@FILE//USER/TELEDIC/CSV'," as discussed in ¶ [0102] of Fukumoto, discloses the above "file system calls." However, the AT command set for modems is not considered a file system or file system calls within the art.

Assuming *arguendo*, that the disclosed expanded AT commands are file system calls, such file system calls would be limited only to the proprietary "expanded AT commands" disclosed in ¶¶ [0100]-[0102] of Fukumoto, and not include the broader vocabulary of standard AT commands, which are used for controlling modem and other telecommunications device functions. Fukumoto explains that the "expanded AT commands" serve as a "method[] of access from the external unit side to the user area 33" (¶ [0100). This does not teach a translation into commands recognizable by "an active function other than storage," as recited in claim 1.

Claim 1 also recites that the "operations of the active function are presented . . . as a series of *apparent* files." Contrary to the assertion on page 4 of the Office Action, Fig. 3 of Fukumoto does not teach "apparent files." Instead, it shows a directory tree (or "file structure") of *real*, not apparent, files. Fukumoto teaches no translation of file system calls to these real files into commands recognizable by an active function other than storage, as recited in claim 1.

As Fukumoto does not teach the above limitations, it is unable to sustain a *prima facie* case of anticipation under 35 U.S.C. § 102(b). As claims 3-9 depend upon claim 1, they are also allowable for at least the reasons discussed above with respect to base claim 1.

Claims 10-14

Claims 10-14 are rejected under 35 U.S.C. § 102(b) is being anticipated by Fukumoto. Applicant respectfully traverses.

For reasons similar to those discussed above with respect to claim 1, Fukumoto does not teach all of the limitations recited in claim 10. The storage function identified in section 6 of the Office Action ("Fig. 1 has storage as well as wireless functions") does not teach a "predetermined function *other than storage*." The "expanded AT command set," discussed in

- 7 -

¶ [0102], does not teach a file command, nor is it translated into a sub-function for controlling a "predetermined function other than storage," as recited. The function cited in the rejection, "read[ing] [a] particular software file," is not a "predetermined function *other than storage*," as recited in claim 10. Additionally, much as discussed with respect to claim 1, there is no "plurality of *apparent* files" disclosed in Fukumoto – Fig. 3 illustrates real files.

As Fukumoto does not teach the above limitations, it is unable to sustain a *prima facie* case of anticipation under 35 U.S.C. § 102(b). As claims 11-14 depend upon claim 10, they are also allowable for at least the reasons discussed above with respect to base claim 10.

Claims 15-17

Claims 15-17 are rejected under 35 U.S.C. § 102(b) is being anticipated by Fukumoto. Applicant respectfully traverses.

For reasons similar to those discussed above with respect to claim 1, Fukumoto does not teach all of the limitations recited in claim 15. The storage function identified in section 7 ("Fig. 2, elements 10a and 10b perform storage and wireless functions") does not teach a "specified function *other than storage*." The "expanded AT command set," discussed in ¶ [0102], does not teach a file call, nor is it translated into a "sub-function commands of the specified function," as recited in claim 15. The function cited in the rejection, "output[ting] [a] desired file," does not teach a "specified function *other than storage*," as recited in claim 15. Additionally, much as discussed with respect to claim 1, there are no "*apparent* files relating to the specified function" disclosed in Fukumoto – Fig. 3 illustrates real files.

As Fukumoto does not teach the above limitations, it is unable to sustain a *prima facie* case of anticipation under 35 U.S.C. § 102(b) against claim 15. As claims 16 and 17 depend upon claim 15, they are also allowable for at least the reasons discussed above with respect to base claim 15.

Claim 18

Claim 18 is rejected under 35 U.S.C. § 102(b) is being anticipated by Fukumoto. Applicant respectfully traverses.

For reasons similar to those discussed above with respect to claim 1, Fukumoto does not teach all of the limitations recited in claim 18. The storage function in Fukumoto does not teach an "active function module *for other than storage*," or "functions *other than storage*." The "expanded AT command set," discussed in ¶ [0102], does not teach file system calls and responses, nor is it translated "into commands recognizable by the active function module for other than storage," as recited. Additionally, much as discussed with respect to claim 1, there are is no "series of *apparent* files" disclosed in Fukumoto – Fig. 3 illustrates real files.

As Fukumoto does not teach the above limitations, it is unable to sustain a *prima facie* case of anticipation under 35 U.S.C. § 102(b) against claim 18.

In view of the above remarks, Applicant respectfully submits that the application is in condition for allowance, and respectfully request the Examiner's favorable reconsideration as to allowance. The Examiner is invited to contact the Applicant's representative listed below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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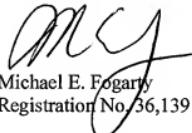
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- 10 -